

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Revision of the Commission's Rules To Ensure	)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency	)	
Calling Systems	)	

To: Chief, Wireless Telecommunications Bureau

**ALLTEL COMMUNICATIONS, INC.**  
**REQUEST FOR LIMITED EXTENSION**  
**OF THE NOVEMBER 1, 2004 QUARTERLY REPORTING DEADLINE**

Pursuant to Sections 1.3 and 1.925 of the Commission's rules, 47 C.F.R. §§ 1.3, 1.925, ALLTEL Communications, Inc. ("ALLTEL") hereby requests a limited, short-term extension of the November 1, 2004 reporting date set forth in the Commission's *Stay Order* in the above-captioned proceeding.<sup>1</sup> For the reasons discussed below, grant of the requested extension through *Friday, November 5, 2004* would be in the public interest. ALLTEL will endeavor to file its report in advance of the requested November 5, 2004 date.

ALLTEL takes its reporting obligations seriously and desires to accurately and meaningfully provide information responsive to the terms of the *Stay Order*, as it has done in all of its reports filed to date. The Excel formatting changes requested of ALLTEL by Commission staff and as outlined in staff's Exceptions Report and confirming the accuracy of those changes in light of staff's instructions, however, have proven more time-consuming than anticipated.

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<sup>1</sup> See *Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, Order to Stay, 17 FCC Rcd 14841, ¶ 29 n.45 (2002).

The minimal extension requested herein will in no way undermine the Commission's objective of verifying compliance with various compliance benchmarks, as ALLTEL has already reported substantial compliance with all benchmarks to date. In any event, as ALLTEL seeks only a short-term extension of the filing deadline, the Commission will have the information required of ALLTEL shortly. Given the Commission's interest in ensuring a complete and accurate report, grant of the instant request is warranted.<sup>2</sup>

For the foregoing reasons, grant of the requested extension of the November 1, 2004 reporting deadline is consistent with the public interest. ALLTEL's requested relief is temporary, limited in scope, and will not undermine the Commission's public interest objectives.

Respectfully submitted,

ALLTEL COMMUNICATIONS, INC.

By: /s/ Glenn S. Rabin  
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November 1, 2004

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<sup>2</sup> See 47 C.F.R. § 1.925(b)(3)(ii); *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (waiver appropriate when "particular facts would make strict compliance inconsistent with the public interest"); *Letter to Ms. Michelle Thomas, Executive Director – Federal Regulatory, SBC Telecommunications, Inc., from Carol E. Matthey, Deputy Chief, Common Carrier Bureau*, 16 FCC Rcd 20159 (Com. Car. Bur. 2001) (granting 1-month extension of reporting date to ensure accuracy of data submitted); *Letter to Mr. James W. Callaway, Group President – SBC Services, from Carol E. Matthey, Deputy Chief, Common Carrier Bureau*, 15 FCC Rcd 15001 (Com. Car. Bur. 2000) (granting 3-month extension due in part to ensure accuracy and to "significant, and unanticipated, additional work" necessary to complete report).